

# Kasell Law Firm

October 23, 2024

Magistrate Judge Sanket J. Bulsara  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Courtroom 13C South  
Brooklyn, New York 11201

**Re: Scheduling Dispositive Motions in *Kevin Pollack v. Jodie Gordon and Fusion Models BK LLC*, No. 23 Civ. 02376 (E.D.N.Y.) (SJB)**

Judge Bulsara:

I submit this letter on behalf of both Plaintiff and Defendants.

As this Court knows, this case was assigned to you for all further proceedings on consent of the parties. *See* Dkt. 41. Prior to the reassignment, the District Court entered an order on September 4, 2024, that states: “The parties are to file a letter on the docket within 48 hours of either resolving the case or failing to reach a resolution. If the parties fail to resolve the case, the letter shall propose a briefing schedule on the parties' respective motions.”

The case has not resolved. The parties have meet-and-conferred and proposed the following for the motion on the pleadings by Plaintiff and cross-motion on the pleadings by Defendant:

December 2, 2024: Opening Briefs  
December 23, 2024: Opposition Briefs  
January 6, 2025: Reply Briefs, if any

In addition, this Court entered the following on July 31, 2024:

Minute Entry And Order: A status conference was held on 7/29/2024 before Magistrate Judge Sanket J. Bulsara. Counsel for Plaintiff (David Kasell) and counsel for Defendants (Maria Patelis) were present. As discussed at the conference, the deadline to complete discovery is now 11/29/2024, and the last date to take the first step in dispositive motion practice is now 12/27/2024. If the parties agree to consent to Magistrate Judge jurisdiction in this case for all purposes, the parties should file a signed copy of the consent

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form (Dkt. No. 2). So Ordered by Magistrate Judge Sanket J. Bulsara on 7/29/2024.(FTR Log #10:37-10:56.) (EM) (Entered: 07/31/2024)

As the parties anticipate summary judgment motions as well, the parties propose the same dates above for summary judgment motions: December 2, 2024; December 23, 2024; and January 6, 2025.

Finally, the parties have agreed to exchange expert reports on October 31, 2024. As this issue was not specifically addressed in the scheduling order entered on January 29, 2024, or in the subsequent conference on July 29, 2024, we ask that the Court order October 31, 2024, as the date to exchange expert reports.

Respectfully,

/s/ David Kasell  
*Attorney for Plaintiff Kevin Pollack*